

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO: 21-_____
v.	:	DATE FILED: _____
THOMAS DEL BORRELLO	:	VIOLATIONS:
	:	31 U.S.C. §§ 5324(a)(2) and (d)(2),
	:	and 31 C.F.R. §§ 1010.310 through
	:	1010.314 (aggravated false filing of a
	:	currency transaction report – 8
	:	counts)
	:	31 U.S.C. §§ 5324(a)(1) and (d)(2),
	:	and 31 C.F.R. §§ 1010.310 through
	:	1010.314 (aggravated failure to file a
	:	currency transaction report – 1
	:	count)
		18 U.S.C. § 2 (aiding and abetting)

INFORMATION

COUNTS ONE THROUGH EIGHT
(Aggravated Filing of False Currency Transaction Reports)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to Count One of this information:

1. The Regional Produce Cooperative Corporation (“RPCC”) was a Pennsylvania non-profit cooperative corporation, doing business as Philadelphia Wholesale Produce Market (the “Market”), and had its principal place of business at 6700 Essington Avenue, Philadelphia, Pennsylvania 19153. The Market, which opened on June 5, 2011, was the world’s largest fully-refrigerated wholesale produce terminal. The Market was open to the public and gathered dozens of competitive wholesale produce merchants in a central location to supply fresh produce to the Philadelphia region and beyond.

2. Caesar DiCrecchio, charged elsewhere, was the President and CEO of the Market and exercised control over every aspect of the Market.

3. Defendant THOMAS DEL BORELLO worked at United Check Cashing, located at 1123 South Broad Street in Philadelphia, Pennsylvania.

4. Defendant THOMAS DEL BORRELLO was responsible for United Check Cashing's compliance with financial institution regulations for transactions occurring at United Check Cashing, located at 1123 South Broad Street in Philadelphia, including the preparation and filing of Currency Transaction Reports.

5. Defendant THOMAS DEL BORRELLO supervised other employees who sometimes prepared Currency Transaction Reports.

6. Caesar DiCrecchio regularly caused groups of checks to be delivered to, and cashed at, United Check Cashing, located at 1123 South Broad Street in Philadelphia. These checks were each made out for less than \$10,000, but when cashed as a group, generated in excess of \$10,000 in United States currency. For such currency transactions in excess of \$10,000, regulations require the financial institution to file a Currency Transaction Report, recording, among other things, the name and identifying information of the individual who presented the transaction.

7. On some occasions, Caesar DiCrecchio directed defendant THOMAS DEL BORRELLO, or others at United Check Cashing, to convert the proceeds of those checks into 15 separate money orders collectively totaling approximately \$14,167.

FALSE CURRENCY TRANSACTION REPORTS

8. Defendant THOMAS DEL BORRELLO filed Currency Transaction

Reports in the name of J.D., a person known to the United States Attorney, when reporting Caesar DiCrecchio's transactions.

9. On or about each of the dates set forth below, in the Eastern District of Pennsylvania, and elsewhere, defendant

THOMAS DEL BORRELLO,

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, knowingly caused and attempted to cause, and aided and abetted the causing of, a domestic financial institution to file Currency Transaction Reports for currency transactions in excess of \$10,000 that contain a material omission or misstatement of fact, that is, intentionally causing the filing of false Currency Transaction Reports recording J.D. as the individual who presented the transaction when in fact defendant DEL BORRELLO knew that J.D. had not presented the transaction, which reports are described below for each count, each Currency Transaction Report, constituting a separate count:

Count	Date Currency Transaction Report Filed	Checks Cashed	Transaction Date
1	01-19-2016	\$9,661.00 \$9,701.00	1-15-2016
2	02-16-2016	\$7,887.00 \$2,595.00	2-5-2016
3	02-16-2016	\$6,781.00 \$7,561.00	2-12-2016
4	03-09-2016	\$9,345.00 \$8,718.00	2-19-2016
5	03-09-2016	\$1,000.00 \$8,808.00 \$3,092.00	2-26-2016
6	03-25-2016	\$7,561.00 \$800.00 \$6,781.00	3-11-2016
7	04-29-2016	\$6,781.00	4-13-2016

		\$7,561.00	
8	05-13-2016	\$8,795.00 \$9,766.00	4-22-2016

10. Between in or about November 2015, and in or about May 2016, defendant THOMAS DEL BORRELLO committed these acts set forth in Counts 1 through 9, as part of a pattern of illegal activity involving transactions of more than \$100,000 in a twelve-month period.

In violation of Title 31, United States Code, Sections 5324(a)(2) and (d)(2), 31 Code of Federal Regulations, Sections 1010.310 through 1010.314, and Title 18, United States Code, Section 2.

COUNT NINE
(Aggravated Failure to File Currency Transaction Reports)

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs One through Eight of Count One are realleged here.
2. On or about January 13, 2016, in the Eastern District of Pennsylvania, and elsewhere, defendant

THOMAS DEL BORRELLO,

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, knowingly caused and attempted to cause, and aided and abetted the causing of, a domestic financial institution to fail to file Currency Transaction Reports for currency transactions in excess of \$10,000, that is, intentionally causing a failure to file Currency Transaction Reports for multiple currency transactions totaling more than \$10,000 during any one business day, that is checks in the amount of \$6,781.00 and \$7,561.00, knowing that they are by or on behalf of the same person.

3. Between in or about November 2015, and in or about January 2016, defendant THOMAS DEL BORRELLO committed these acts set forth in Count 10, as part of a pattern of illegal activity involving transactions of more than \$100,000 in a twelve-month period.

In violation of Title 31, United States Code, Sections 5324(a)(1) and (d)(2), 31 Code of Federal Regulations Sections 1010.310 through 1010.314, and Title 18, United States Code, Section 2.


JENNIFER ARBITTIER WILLIAMS
Acting United States Attorney